



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

NS
F.#2020R00275

*271 Cadman Plaza East
Brooklyn, New York 11201*

February 23, 2021

By E-Mail and ECF

Mr. Douglas Morris, Esq.
Federal Defenders of New York, Inc.
Eastern District of New York
One Pierrepont Plaza, 16th Floor
Brooklyn, New York 11201

E-Mail: douglas_morris@fd.org

Re: United States v. Donnell Russell
Criminal Docket No. 20-427 (AMD)

Dear Mr. Morris:

Enclosed please find the government's additional discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. The government also continues to request reciprocal discovery from the defendant. Enclosed please find copies of the following items.

<u>Discovery Exhibit</u>	<u>Description</u>
11	Affidavit and Search Warrant to search a forensic examination report of an Apple iPhone belonging to the defendant
12	Forensic Examination Report for an Apple iPhone belonging to the defendant
13	Subscriber information for three Google accounts
13a	Business Records Certification

14	Sprint Records for Telephone Number (312) 975-5608
15	T-Mobile Records for Telephone Number (312) 975-5608
15a	Business Records Certification
16	T-Mobile Records for Telephone Number (312) 203-3030
16a	Business Records Certification
17	AT&T Records for IP address 108.90.240.242
17a	Business Records Certification
18	T-Mobile Records
18a	Business Records Certification
19	Google Records related to various YouTube videos
19a	Business Records Certification
20	Facebook Records for “suvivinglies” account
21	Oath Records for two Yahoo! Email Accounts
21a	Business Records Certification
22	Subscriber information for account ib.drussell@gmail.com
22a	Business Records Certification
23	United States Postal Service (“USPS”) Records for Tracking Number 7018 0680 0001 3304 2470
23a	Business Records Certification
24	USPS Records for Tracking Number 9590 9402 4018 8079 6963 58
24a	Business Records Certification
25	Redacted Report of Investigation Regarding the Defendant’s Arrest
26	Redacted text message communications from Telephone Number (312) 203-3030 to Jane Doe #1 and Jane Doe #2

Very truly yours,

SETH D. DuCHARME
Acting United States Attorney

By: _____ /s/
Elizabeth Geddes
Nadia Shihata
Maria Cruz Melendez
Assistant U.S. Attorneys
(718) 254-7000

Enclosures

cc: Clerk of the Court (by ECF) (without enclosures)